IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KIMBERLY ORD, KEVIN ORD on behalf of themselves and all other persons similarly Situated.

Plaintiffs.

12cv0766

LEAD CASE

ELECTRONICALLY FILED

v.

F.N.B. CORPORATION, AND FIRST NATIONAL BANK OF PENNSYLVANIA,

Defendants.

JOAN CLAREY individually and on behalf of others similarly situated,

12cv1305

Consolidated Plaintiffs,

MEMBER CASE

v.

FIRST NATIONAL BANK OF PENNSYLVANIA.

Consolidated Defendant.

MOTION FOR LEAVE TO REQUEST ADMISSION PRO HAC VICE

Plaintiff, Joan Clarey, by her attorney, Stanley M. Stein, Esq. and Stanley M. Stein, PC, member of the bar of the United States District Court for the Western District of Pennsylvania, moves this Honorable Court for leave to request Admission *Pro Hac Vice* of Stephen J. Fearon, Jr., Esq. for purposes of this particular proceeding, stating as follows:

1. Stanley M. Stein, Esq. is with the firm Stanley M. Stein, PC, 445 Fort Pitt Boulevard, Suite 150, Pittsburgh, PA 15219 and is a member in good standing of the bar of the United States District Court for the Western District of Pennsylvania.

- 2. Stephen J. Fearon, Jr., Esq. of the law firm of Squitieri & Fearon, LLP, 32 East 57th Street, 12th Floor, New York, New York 10022 is counsel for plaintiff, Joan Clarey.
- 3. Stephen J. Fearon, Jr. Esq. is a member in good standing of the State and Federal bars of New York. Please see Exhibit A attached hereto.
- 4. Plaintiff, Joan Clarey, desires that attorney Stephen J. Fearon, Jr. assist in representing her interests because of his familiarity with the parties and the causes of action.
- 5. Plaintiff, Joan Clarey, further desires that Stanley M. Stein, Esq., as a member of the bar of this Court, remain as counsel of record, together with Stephen J. Fearon, Jr. Esq. Any service of motions, pleadings and Orders of the Court may be directed to Stanley M. Stein, Esq. at Stanley M. Stein, PC.

WHEREFORE, the movant, Stanley M. Stein, Esq., respectfully moves this Honorable Court for an Order granting leave to permit the admission *Pro Hac Vice* of Stephen J. Fearon, Jr., Esq., for purposes of this particular action.

Dated: October 11, 2012 Respectfully submitted,

/s/ Stanley M. Stein

STANLEY M. STEIN, PC 445 Fort Pitt Boulevard Suite 150 Pittsburgh, PA 15219

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Email: smstein@smsteinlaw.com

Attorneys for Plaintiff Joan Clarey

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2012, a true and correct copy of the within Motion for Admission *Pro Hac Vice* of Stephen J. Fearon, Jr. to the United States District Court for the Western District of Pennsylvania was forwarded to all counsel of record via the Court's electronic filing system.

/s/ Stanley M. Stein
Stanley M. Stein

CERTIFICATE OF ECF REGISTRATION PURSUANT TO Misc. No. 06-151

I hereby certify that your moving counsel is a registered user of ECF in the United States

District Court for the Western District of Pennsylvania. I further certify that the undersigned

counsel has read, knows and understands the Local Rules of the Court.

/s/ Stanley M. Stein
Stanley M. Stein

EXHIBIT A

EXHIBIT A – STEPHEN J. FEARON, JR.

Supreme Court State of New York - August 12, 1991 - Bar No.: 2432474 - Active Status

United States District Court for the Southern District of New York - November 21, 1991 – Active Status

Sixth Circuit Court of Appeals - February 22, 1993 - Active Status

United States District Court for the Eastern District of New York - April 23, 1993 - Active Status

Northern District of Georgia - May 2, 2006 - Active Status

Western District of Michigan - November 17, 1994 - Active Status

Eighth Circuit Court of Appeals - October 19, 2000 - Active Status

Eastern District of Michigan - March 25, 1996 - Active Status

Second Circuit Court of Appeals - April 7, 1999 - Active Status

Ninth Circuit Court of Appeals - November 27, 2006 - Active Status

District of Arizona - September 12, 1995 - Active Status